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FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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In the Matter of	)	
Equal Access and Interconnection	)	CC Docket No. 94-54
Obligations Pertaining to	)	RM-8012
Commercial Mobile Radio Service	)	

**MOTION FOR EXTENSION OF TIME TO COMMENT**

GTE Service Corporation ("GTE"), on behalf of GTE's telephone and wireless service companies, moves the Commission for an extension of time pursuant to Section 1.46 of the Commission's Rules, in order to fully comment on the Notice of Proposed Rulemaking and Notice of Inquiry (the "NPRM") released July 1, 1994, regarding equal access and interconnection requirements for cellular and other CMRS providers. Comments are due August 30, 1994, and reply comments are due September 29, 1994. In light of the extensive nature of the NPRM and the wide array of issues that commenters are expected to address with exacting detail, GTE respectfully requests a thirty-day extension in which to provide their comments to the Commission.

The Commission reached the tentative conclusion in the NPRM that cellular providers should be required to provide equal access to interexchange carriers. As the Commission recognized, the imposition of equal access and the expansion of interconnection requirements will fundamentally alter cellular carriers' networks and operations. The cost of implementation would be substantial and would have important ramifications on the provision of cellular

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service for many years to come. GTE wishes to assist the Commission in its contemplation of these issues with substantive comments and supporting documentation.

The Commission has requested that commenters address at least 18 broad topics and more than 60 specific issues. These matters include discussion of cellular market power and the effects of broadband personal communications services ("PCS") and wide-area specialized mobile radio ("SMR") services; whether the benefits of equal access will outweigh the considerable costs; whether equal access should be extended to all CMRS providers; and whether interconnection and resale should be required of all CMRS carriers. The Commission has clearly expressed a desire for an extensive and accurate record on which to base its decisions on these important issues. See, e.g., NPRM at ¶¶ 30, 31, 34, 42, 43, 48, 49, 68, 69, 76, 77, 92, and 99.

The matters raised by the NPRM are diverse and complex and range from the internal business workings of carriers small and large to the outward competitive marketplace which necessarily includes PCS and SMR. In addressing the competitive effects of PCS, commenters are asked to consider regulations and spectrum allocations that have been finalized only recently by the Commission, but that are certain to create competition in the cellular market.

The Commission's view that a comprehensive record would be essential to this important rulemaking proceeding was affirmed not only by the text of the NPRM but also by the separate statements

issued by three Commissioners. Commissioner Quello stated that

it is appropriate that the Commission ask the specific and detailed questions posed in the Notice. I concur in the tentative conclusion only to the extent that it will focus the commentor precisely on the issue in order to more completely develop the record.

(Statement of Commissioner James R. Quello.) (Emphasis added.)

Commissioner Barrett noted that the record on which the NPRM was based "is not exactly current" and went on to state that

the tentative conclusion must be challenged in the record, and a thorough assessment of wireless market competition conditions and cost-benefit analysis must occur. The notice encourages comments which analyze the underlying factors used to justify equal access obligations. I look forward to reviewing the record of this proceeding, and the market basis for considering any type of equal access obligation in the CMRS area.

(Separate Statement of Commissioner Andrew C. Barrett.) (Emphasis added.) Commissioner Chong stated that

the record compiled to date on equal access issued in the CMRS context is inchoate. . . . we do not yet have a complete record on which to base final decisions. I believe it is therefore necessary and appropriate for the Commission to seek a more comprehensive and focused record in this proceeding to facilitate resolution of equal access and interconnection issues regarding CMRS providers. . . .

(Separate Statement of Commissioner Rachelle B. Chong.) (Emphasis added.)

The Commissioners' entreaties become all the more significant when coupled with each Commissioner's avowed intention to examine the record closely to determine whether the imposition of equal access, in any form, is warranted. For example, Commissioner Chong wrote,

I emphasize that today's tentative conclusion regarding equal access requirements for cellular licensees is just


that--tentative. I believe it is important for the Commission carefully to consider the evolving nature of competition in commercial mobile radio services generally, prior to reaching any final decisions in this proceeding regarding equal access and interconnection issues with respect to any CMRS provider.

(Separate Statement of Commissioner Rachelle B. Chong.)

GTE and its cellular subsidiaries form the second largest cellular company in the United States. As such, GTE believes that it can provide a uniquely valuable perspective through its comments. However, comments of the depth and specificity expected by the Commission on such an extensive list of issues--issues that will have an enormous impact on the cellular industry--will necessitate more time than currently provided by the comment period.

For these reasons, GTE requests that a thirty-day extension of time be granted them so that they may gather the appropriate supporting data and prepare comments that will be accurate, informative, and meaningful to the Commission's evaluations.

Respectfully submitted,

  
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